ICORE
Settlements
Separations and Costs
Engineering/Technical Services
Management Consulting

Jan F. Reimers
President

December 16, 1996

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

RE: CC Docket No. 96-45 Federal-State Joint Board Recommended Decision Regarding Universal Service

Dear Mr. Caton:

Enclosed herewith for filing with the Commission are the original and four copies of the Comments of ICORE, Inc., on behalf of many small telephone companies, in the above-captioned matter.

Please acknowledge receipt hereof by affixing a notation on the duplicate copy of the letter furnished herewith for such purpose and remitting same to bearer.

Sincerely,

Enclosures

cc: International Transcription Service (1 copy)
Federal-State Joint Board Service List (Attached)

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of:	)	
	)	
Federal-State Joint Board	)	CC Docket No. 96-45
Recommended Decision Regarding	)	
Universal Service	)	

COMMENTS OF THE ICORE COMPANIES

The following Companies, through the consulting firm of ICORE, Inc. (ICORE), offer Comments to the Federal Communications Commission (FCC or Commission) on the Federal-State Joint Board's Recommended Decision of November 7, 1996 concerning universal service. In a Public Notice of November 18, 1996, the Commission sought Comments in this matter by December 16, 1996, and Reply Comments by January 10, 1997.

The parties listed below represent a cross section of small, rural Independent telephone companies that have long been the standard bearers of universal service in rural America, and will thus be profoundly affected by the many changes being recommended by the Joint Board.

Adams Telephone Cooperative, Golden,IL;
Armour Independent Tel. Co., Hartford, SD;
Baraga Telephone Company, Baraga, MI;
Barry County Telephone Company, Delton, MI;
Bascom Mutual Telephone Co., Bascom, OH;
Bentleyville Telephone Co., Bentleyville, PA;

Bloomingdale Home Telephone Co., Bloomingdale, IN;
Blue Earth Valley Telephone Co., Blue Earth, MN;
Breda Telephone Corporation, Breda, IA;
Bridge Water Telephone Company, Hartford, SD;
Bruce Telephone Company, Bruce, MS;
Cannon Valley Telecommunications, Inc., Bricelyn, MN;
Citizens Tel. Co. of Kecksburg, Mammoth, PA;
Citizens Telephone Corp., Warren, IN;
Clear Lake Independent Tel. Co., Clear Lake, IA;
Clements Telephone Company, Redwood Falls, MN;
Climax Telephone Company, Climax, MI;
Cobbosseecontee Telephone & Telegraph Co., Gardiner, ME;
Community Service Telephone Co., Winthrop, ME;
Coon Valley Cooperative Tel. Assn., Inc., Menlo, IA;
Cooperative Telephone Company, Victor, IA;
Cooperative Telephone Exchange, Stanhope, IA;
Craigville Telephone Company, Inc., Craigville, IN;
Cuba City Telephone Exchange Co., Madison, WI;
Dixville Telephone Company, Dixville Notch, NH;
Doylestown Telephone Company, Doylestown, OH;
Dunbarton Telephone Company, Inc., Dunbarton, NH;
Easton Telephone Company, Blue Earth, MN;
Eckles Telephone Company, Blue Earth, MN;
Egyptian Telephone Cooperative Assn., Steeleville, IL;
Farmers Mutual Telephone Company, Bellingham, MN;
Farmers Mutual Telephone Company, Okolona, OH;
Fort Jennings Telephone Company, Fort Jennings, OH;
Gervais Telephone Company, Gervais, OR;
Graceba Total Communications Inc., Ashford, AL;
Granada Telephone Company, Hector, MN;
Harmony Telephone Company, Harmony, MN;
Hart County Telephone Company, Hartwell, GA;
Hartington Telephone Company, Hartington, NE;
Hickory Telephone Company, Hickory, PA;
Hollis Telephone Company, Wilton, NH;
Home Telephone Company, Brady, NE;
Home Telephone Company, Grand Meadow, MN;
Hot Springs Telephone Company, Missoula, MT;
Huxley Cooperative Telephone Co., Huxley, IA;
Ironton Telephone Company, Coplay, PA;
Jefferson Telephone Company, Inc., Jefferson, SD;
Kaleva Telephone Company, Kaleva, MI;
Kalida Telephone Company, Inc., Kalida, OH;

Laurel Highland Telephone Company, Stahlstown, PA;
Ligonier Telephone Company, Ligonier, IN;
Marianna & Scenery Hill Telephone Co., Marianna, PA;
Marseilles Telephone Company, Metamora, IL;
McClure Telephone Company, McClure, OH;
McDonough Telephone Cooperative, Inc., Colchester, IL;
Merchants & Farmers Telephone Co., Hillsboro, IN;
Metamora Telephone Company, Metamora, IL;
Mid Century Telephone Cooperative, Inc., Canton, IL;
Mid-Iowa Telephone Cooperative Assn., Gilman, IA;
Middle Point Home Telephone Company, Middle Point, OH;
Midwest Telephone Company, Parkers Prairie, MN;
Minford Telephone Company, Minford, OH;
Minnesota Lake Telephone Co., Minnesota Lake, MN;
Mutual Telephone Company, Sioux Center, IA;
New Lisbon Telephone Company, New Lisbon, IN;
North-Eastern Pennsylvania Telephone Co., Forest City, PA;
Northern Iowa Telephone, Sioux Center, IA;
Nova Telephone Company, Nova, OH;
Odin Telephone Exchange, Inc., Odin, IL;
Ontario Telephone Company, Inc., Trumansburg, NY;
Orwell Telephone Company, Orwell, OH;
Oregon Farmers Mutual Telephone Co., Oregon, MO;
Osakis Telephone Company, Parkers Prairie, MN;
Ottoville Mutual Telephone Co., Ottoville, OH;
Pennsylvania Telephone Company, Jersey Shore, PA;
Peoples Mutual Telephone Company, Gretna, VA;
Pierce Telephone Company, Inc., Pierce, NE;
Pine Tree Telehone & Telegraph Co., Gray, ME;
Pymatuning Independent Telephone Co., Greenville, PA;
Redwood County Telephone Co., Redwood Falls, MN;
Ringgold Telephone Company, Ringgold, GA;
Searsboro Telephone Company, Searsboro, IA;
Shawnee Telephone Company, Equality, IL;
Shell Rock Telephone Company, Shell Rock, IA;
South Canaan Telephone Company, South Canaan, PA;
Southern Montana Telephone Co., Wisdom, MT;
State Long Distance Telephone Company, Elkhorn, WI;
Stayton Cooperative Telephone Co., Stayton, OR;
Stockholm-Strandburg Telephone Co., Stockholm, SD;
Summit Telephone Company, Fairbanks, AK;
Swayzee Telephone Company, Swayzee, IN;
Sycamore Telephone Company, Sycamore,OH;

Topsham Telephone Company, Inc., East Corinth, VT;
Tri County Telephone Company, New Richmond, IN;
Tri-County Tel. Membership Corp., Belhaven, NC;
Trumansburg Home Telephone Co., Trumansburg, NY;
Union Telephone Company, Hartford, SD;
Valley Telephone Company, Inc., Parkers Prairie, MN;
Venus Telephone Corporation, Venus, PA;
Volcano Telephone Company, Pine Grove, CA;
Wabash Telephone Cooperative, Inc., Louisville, IL;
West Iowa Telephone Company, Remsen, IA;
West Liberty Telephone Company, West Liberty, IA;
Western Telephone Company, Faulkton, SD;
Wikstrom Telephone Company, Inc., Karlstad, MN;
Wilton Telephone Company, Wilton, NH;
Yadkin Valley Telephone Membership Corp., Yadkinville, NC;
Yeoman Telephone Company, Inc., Yeoman, IN;
Yukon-Waltz Telephone Company, Yukon, PA;

I. INTRODUCTION

The small, rural incumbent Local Exchange Carriers (rural carriers) participating in this filing commend the Federal-State Joint Board on universal service for a job well done. In our increasingly competitive industry, the maintenance of universal service -- in principle as well as practice -- requires a daring high wire walk worthy of the Wallendas.

The Joint Board's recommendations represent a balancing act so skilled that, for the most part, only minor improvements will be needed to preserve universal service in a competitive environment. There is, however, one potential disaster area where the Joint Board is working without a net -- the freeze of existing support mechanisms and the transition to a proxy model for rural carriers. Serious accidents seem inevitable.

But it is no accident that the United States has the best telecommunications system in the world, nor that rural and suburban Americans have access to virtually the same high quality, state-of-the-art services and facilities as their urban counterparts. The companies represented herein have long provided universal service at affordable rates, steadfastly meeting their carrier of last resort obligations.

Rural carriers have been able to accomplish these objectives primarily through (1) tireless dedication to their customers and (2) sound regulatory policies that have included a variety of beneficial high cost assistance and cost allocation mechanisms. Yet the three mechanisms most

crucial to the preservation of universal service in rural America -- high cost loop assistance (USF), Long Term Support (LTS), and DEM weighting -- have been effectively terminated by the Joint Board's recommendation, to be replaced over a transition period by an unknown proxy system.

The large, urban, mostly Price Cap carriers that are being moved to a proxy system have relatively little at risk compared to the rural carriers. For the most part, the large carriers contribute to -- not receive -- LTS; are not eligible for DEM weighting; and receive USF assistance that equates to only a small percentage of their total revenue requirements. Rural carriers, on the other hand, often draw from all three of these sources, in amounts crucial to the preservation of universal service.

The very substantial revenues generated from USF, LTS and DEM weighting have played a key role in bringing modern facilities, including digital switching and optical fiber, to the most remote areas of the United States. They are today helping to extend the information superhighway into the heart of rural America, with services such as distance learning and telemedicine being made available to citizens who might otherwise be isolated from these wonderful innovations.

These known and predictable support and cost allocation mechanisms properly recognize the higher costs, as well as the cost volatility, of small rural carriers in providing universal service at reasonable prices. They have, in fact, assured universal service. The recommendation to replace them with an unknown proxy model puts the future of universal service in rural America at serious risk.

II. THE PROPOSED FREEZE OF USF, LTS AND DEM WEIGHTING SUPPORT LEVELS WILL CREATE BOTH WINDFALLS AND SHORTFALLS

Freezing USF, LTS and DEM weighting on an individual carrier basis will create catastrophic results. Costs incurred after the freeze date -- in many cases, the substantial costs of necessary switch replacements and outside plant upgrades -- will be completely ignored. Carriers that would otherwise be eligible for assistance will be unfairly excluded from funding. Conversely, carriers with depreciating costs that would normally receive reduced support levels will be artificially sheltered from such reductions.

There are many rural carriers in this filing serving a single exchange with fewer than 1,000 access lines. A major plant addition -- a new digital switch or cable and wire facilities -- can more than double their net investment. For these carriers, however, the significant cost of a new switch, if added after 1996, will not be recovered. Nor will loop costs incurred after 1995. In fact, a rural carrier not eligible for USF support as of the freeze date will never receive such support regardless of how much it has to spend on loop plant to provide universal service in 1996 and beyond.

The costs of rural carriers are not just higher on a per line basis than urban carriers, they are far more volatile. This volatility is what a company specific freeze fails utterly to address. Small rural carriers routinely experience enormous cost changes from year to year, due to factors ranging from natural disasters to the normal replacement of aging plant. They have very small

numbers of access lines over which to spread these costs, and limited sources of cost recovery. For many rural carriers, a freeze of USF and DEM weighting effectively eliminates one critical revenue source, creating the potential for huge local rate increases. Universal service is not well served in such a scenario.

Carriers deriving their interstate settlements from NECA's average schedule formulas, as well as those using an individual cost basis, will be adversely affected. A freeze in the DEM weighting component of the traffic sensitive central office (TS CO) formula will unfairly limit settlements to the nation's very smallest carriers, while a USF freeze will preclude NECA from improving and expanding its average schedule USF proxy system.

Unfortunately, the Joint Board's recommendation makes the vintage of costs -- not their validity, or level, or appropriateness -- the main criterion for support. Vintage seems one of the least worthy determinants of an individual carrier's eligibility for, or level of, funding.

At the very least, those rural carriers that have ordered new switches in 1996 -- but will not take delivery until 1997 or later -- should not have their DEM weighting frozen until after their new switches are placed in service. This would at least take some of the arbitrariness, or "luck of the draw," out of the Joint Board's recommendation. It would treat commitment to a new switch equally to installation of a new switch, removing a number of factors over which

carriers have little or no control -- manufacturer's backlogs, unforeseen scheduling delays and the like -- from the equation.

If the Joint Board's main objective is to limit the growth or control the size of the various support funds, freezing the funds in total -- rather than on a carrier by carrier basis -- would be an even better alternative, however. In other words, that portion of USF and LTS flowing to rural carriers could be frozen at current levels or allowed to grow only by the percentage growth in aggregate rural carriers' access lines. Rural carriers' embedded costs could then be used to determine funding on an individual basis. DEM weighting should not be frozen or transferred to a high cost fund, as discussed more fully below.

Freezing LTS and USF in total would still limit support payments, while allowing those carriers experiencing significant cost changes the opportunity to become eligible for funding, or for increased or reduced support levels as appropriate.

III. DEM WEIGHTING ISSUES SHOULD BE ADDRESSED IN THE CONTEXT OF A COMPREHENSIVE ACCESS AND SEPARATIONS REFORM PROCEEDING

First and foremost, DEM weighting is a rational cost allocation method rather than a high cost support mechanism. It properly recognizes that a disproportionate amount of the cost of a rural carrier's switching plant is attributable to toll network functions. Rural carriers could serve their local customers only with little more than a PBX.

As pointed out in previous comments, the relatively small digital switches owned by rural carriers clearly have higher costs per access line than very large switches. A large portion of the cost of such a switch relates to the central processing hardware and software, which varies little with the number of access lines. ICORE clients with exchanges serving fewer than 500 lines typically pay about $250,000 for a switch, or over $500 per line. A switch serving 20,000 lines might cost $2,000,000, or $100 per line. A software upgrade alone for a 500 line switch often costs in excess of $50,000 -- or more than the total equivalent per line cost of a larger switch.

Current DEM weighting procedures not only properly recognize these higher per line switching costs, but their proportionately greater value to the interexchange network as well. Most of the sophisticated and expensive features inherent in today's digital switches are necessary for network functions -- translation, equal access, SS7, expanded CICs, 500 and 900 portability services, etc. These network costs exist whether the switch handles 1 interstate minute, or 100 million. Since the costs associated with purely local (and in most cases, EAS) services would be minimal, a weighted cost allocation methodology which assigns more costs to the interstate jurisdiction is completely appropriate.

In addition, most rural carriers continue to charge for local service on a flat rate basis, so local usage is perceived by customers as "free." Toll usage, conversely, is restricted by its volume sensitive nature. DEM weighting rightfully recognizes the deterrent effect of toll versus local pricing. To a very real degree, DEM weighting represents a cost allocation methodology that recognizes the higher interstate switching costs of the smaller carriers, rather than being a "subsidy" or "assistance" mechanism.

There are thus a number of valid reasons for continuing DEM weighting, as well as for treating it differently from LTS and USF support. LTS and USF are designed to help cover high local loop costs. The local loop can be used by, and be of value to, all entities listed by the Joint Board as mandatory contributors to universal service support mechanisms.

The interexchange switching function is used by, and of value to, a far more discrete set of entities. Continuing DEM weighting as a component of access charges leaves costs squarely where they belong -- on those benefiting from toll switching. Transferring DEM weighting into a new universal service support plan, funded by mandatory contributors, will place an unfair burden on some entities, while allowing others to pay far less than they should.

The ICORE companies thus recommend that full DEM weighting be maintained for all rural carriers with 50,000 or fewer access lines -- and that it be left as a component of access charges -- pending a comprehensive proceeding to include both access and separations reform. It is not only a rational cost allocation mechanism and a natural component of access charges, but a substantial revenue source for all rural carriers, both average schedule and cost.

DEM weighting is so critical to the financial health of rural carriers -- and to their ability to provide universal service -- that it should only be addressed in a deliberative and comprehensive manner, in conjunction with other broad proceedings. To freeze and phase it out in favor of a totally unknown proxy model is a piecemeal approach that may ultimately do great harm to universal service.

IV. PRESCRIPTION OF A MANDATORY TRANSITION TO AN UNKNOWN PROXY SYSTEM IS PREMATURE AND MAY ENDANGER UNIVERSAL SERVICE

It has yet to be proven that any proxy system can replicate the costs of rural carriers, whose investments may double or expenses increase by 50% from one year to the next, due to carrier-specific events rather than broad industry conditions and trends. Again, the volatility of rural carriers' costs makes the use of mandatory proxies an extremely risky business.

The LEC industry has long maintained a proxy system for determining interstate settlements for small rural carriers, i.e., the average schedule formulas. Yet after years of statistical studies, refinements and enhancements -- first by AT&T and USTA, and now NECA -- it is universally recognized that these formulas cannot possibly simulate the costs of all rural carriers. Those whose costs or traffic patterns cannot be replicated by the formulas are allowed to derive their interstate settlements using their individual costs.

A mandatory proxy system, on the other hand, will not allow such an option. Those carriers whose costs cannot be accurately predicted will have no alternative but to raise local rates, cut back on services, or eliminate necessary plant additions.

The FCC, in considering the Joint Board's recommendation of a hard and fast transition to a mandatory proxy model for rural carriers, should ask itself two very serious questions:

(1) How will these carriers be able to effect any sort of medium or long range planning, forecasting and budgeting when known and predictable revenue streams

are being replaced by a totally unknown proxy system, and

(2) What incentive will they have to add or replace plant, or expand operations and services, when there is no assurance that they will be afforded the opportunity to recover these additional costs?

If the Commission cannot answer these questions with a high degree of certainty, it should not, at this time, approve a mandatory proxy plan for rural carriers.

V. CONCLUSION

The Joint Board's recommendations are, for the most part, reasonable, including its proposal to use proxy models for the nation's large, urban incumbent Local Exchange Carriers. These carriers currently represent well over 90% of total LEC industry revenue requirements. Their costs are fairly predictable, and they have huge subscriber bases and a myriad of services over which to spread their costs.

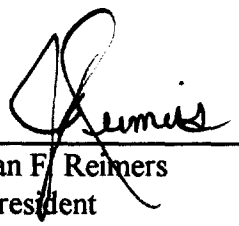
Rural carriers are far different. They serve more remote areas with far fewer subscribers, and their costs are therefore higher, more volatile, and more unpredictable. Provision of universal service is very expensive. New competitors are not necessarily clamoring to serve the low revenue producing residential and small business customers, scattered over large areas, that typically constitute the rural carriers' subscriber base.

Because of these factors, and because rural carriers account for less than 10% of LEC industry revenue requirements -- but are responsible for universal service in many areas of the country -- it may behoove the Commission to take a more cautious approach with regard to wholesale changes in their support mechanisms.

Much more work needs to be done on proxy models to determine if they can reliably predict the volatile costs of rural carriers. Comprehensive access and separations reform proceedings need to be undertaken. The rate and level of competition in rural areas should be monitored to determine if there is even the slightest resemblance to competition in urban markets.

Until the Commission has this kind of information, it should not threaten universal service by sanctioning any major changes in the flow of LTS, USF or DEM weighting support to rural carriers.

Respectfully submitted,
ICORE, Inc.



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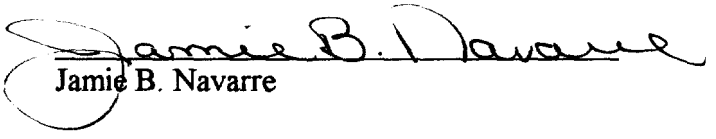
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served by First Class mail, postage prepaid, to the individuals on the attached list this 16th day of December, 1996:



Jamie B. Navarre

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